

Accountability Hotline Case #183**Background**

In July 2015 the Auditor's Accountability Hotline received a report about the process for employees to request disability accommodations. The person reported they had been asked to provide medical information about job duties unrelated to their job. They were told the process could not move forward without signing a medical release form. In response, the Human Resources department worked with the employee to resolve their request and I initiated an audit to compare Metro's process to other governments.

Key findings

- Interactive process was inflexible. Some of the information reported to the Accountability Hotline was confirmed. The process did not provide an opportunity for an informal discussion of their disability and requested accommodation. The employee was told they could only proceed with the process if they authorized access to medical records. In addition, there was little engagement with the employee after they questioned the accuracy of the job duties listed in the letter to their health care provider.
- Other local governments in the region use checklists, process guides, and forms to ensure consistent handling of accommodation requests. The checklists and guides can help process administrators and employees understand key decision points and documentation requirements. Standard request and resolution forms can ensure consistent treatment of requests while still providing flexibility to structure the process appropriately.

Recommendations

To improve the ADA accommodation request process Metro should:

1. Create guidance documents and forms including:
 - a. A step-by-step guide to the interactive process;
 - b. A checklist for the process and options for documentation;
 - c. An accommodation request form for employees; and
 - d. An accommodation request resolution form to document the decision.
2. Make guidance documents easily accessible.
3. Update the ADA policy to provide flexibility for documenting a disability and include by reference the guidance documents used to administer the policy.